

Robert A. Julian (SBN 88469)  
Cecily A. Dumas (SBN 111449)  
BAKER & HOSTETLER LLP  
1160 Battery Street, Suite 100  
San Francisco, CA 94111  
Telephone: 628.208.6434  
Facsimile: 310.820.8859  
Email: rjulian@bakerlaw.com  
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)  
David J. Richardson (SBN 168592)  
Lauren T. Attard (SBN 320898)  
BAKER & HOSTETLER LLP  
11601 Wilshire Blvd., Suite 1400  
Los Angeles, CA 90025-0509  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: esagerman@bakerlaw.com  
Email: drichardson@bakerlaw.com  
Email: lattard@bakerlaw.com

*Counsel to the Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF RICHARD  
BARTON IN SUPPORT OF MOTION OF  
THE OFFICIAL COMMITTEE OF  
TORT CLAIMANTS PURSUANT TO 11  
U.S.C. §§ 105(a) AND 501 AND FED. R.  
BANKR. P. 3003(c) FOR ENTRY OF AN  
ORDER EXTENDING THE BAR DATE**

Date: November 13, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102  
Objection Deadline: November 6, 2019

Steven J. Skikos (SBN 148110)  
Gregory T. Skikos (SBN 176531)  
Matthew J. Skikos (SBN 269765)  
**SKIKOS, CRAWFORD, SKIKOS & JOSEPH**  
One Sansome Street, Suite 2830  
San Francisco, CA 94104  
Telephone: 415-546-7300  
Facsimile: 415-546-7301  
sskikos@skikos.com  
gskikos@skikos.com  
mskikos@skikos.com

*Attorneys for Declarant*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

|                                 |   |
|---------------------------------|---|
| <b>In re:</b>                   | ) Bankr. Case No. 19-30088-DM           |
|                                 | )                                       |
| <b>PG&amp;E CORPORATION</b>     | ) <b>DECLARATION OF RICHARD</b>         |
|                                 | ) <b>BARTON IN SUPPORT OF MOTION TO</b> |
| <b>-and-</b>                    | ) <b>EXTEND CLAIMS BAR DATE</b>         |
|                                 | )                                       |
| <b>PACIFIC GAS AND ELECTRIC</b> | ) Date: TBD                             |
| <b>COMPANY,</b>                 | ) Time: TBD                             |
|                                 | ) Place: United States Bankruptcy Court |
| <b>Debtors.</b>                 | ) Courtroom 17, 16th Floor              |
|                                 | ) San Francisco, CA 94102               |
|                                 | )                                       |
|                                 | )                                       |
|                                 | )                                       |
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|                                 | )                                       |
|                                 | )                                       |

I, Richard Barton, declare as follows:

1. I am over the age of 18. I have personal knowledge of the facts contained in this declaration, and if called as a witness, I could and would testify competently thereto. I worked in law enforcement for 24 years.
2. I was a first responder paramedic prior to being in law enforcement. I worked as a

1 D.A. investigator in Butte County. I now run advanced classes for peace officers  
2 throughout the state on child abuse investigation and adult sexual assault  
3 investigations.

4 3. I owned my home on Berkshire Way in Paradise, California. I had lived in Paradise  
5 for 15 years before the fire destroyed our town. My home was completely burned by  
6 the Camp Fire that occurred on November 8, 2018. On the morning of the fire, I was  
7 out of the area. I was running a child abuse investigation class in Carmel, California.  
8 In addition to my home, I lost all my belongings, my cat, and my community. I had an  
9 extensive collection of model railroads.

10 4. I'm writing this declaration not for myself. I have an attorney. I'm writing this for  
11 others who do not have the same access to trusted information or the same  
12 experiences that I have had.

13 5. My lot was approximately 1/2 acres of forested land. After the fire, PG&E had a  
14 logging company enter my property without authorization. The company removed a  
15 significant percentage of the trees on my land. I did not approve this, and the  
16 company did not call me until after the trees had been logged. The company did send  
17 me an email. I went to my property and the lot had already been already cleared.  
18 Some trees on my property were probably dead from the fire, but others were alive,  
19 including my 200-year-old pine. Many of the trees the logging company took were  
20 not near the utility line and were healthy. I don't understand why they couldn't work  
21 with me on this. I don't understand why PG&E's company would log my healthy  
22 trees without my permission and further devastate my lot unless PG&E wanted to  
23 discourage me from rebuilding.

24 6. In my communication with my insurance company, my adjusters never disclosed that  
25 it was trying to recover money from PG&E for the payments it was making to fire  
26 survivors. My adjusters never told me they were settling with PG&E.

1 7. My property has now been cleaned and certified by the county. However, most of the  
2 trees are gone. The properties around me haven't been cleaned.

3 8. One of the problems with notice from PG&E is that PG&E is not trusted. I do not recall  
4 receiving a notice about the bankruptcy from PG&E in the mail. However, I do remember  
5 when the San Bruno explosion took place and, as a first responder, I thought about the  
6 first responders there and the hazards they faced. I remember PG&E's apology ads and  
7 how PG&E said that they were going to change and prioritize safety inspections of gas  
8 lines. Reading the papers later, I learned about PG&E executives getting bonuses and  
9 raises. PG&E didn't learn after San Bruno, or after the other fires. Why would anything  
10 from them be trusted now? People need information from a trusted source.

11 9. None of the fire victims should be precluded from recovering for their losses, but  
12 they need more time to learn the facts about this bankruptcy and to be given a fair  
13 opportunity to participate in the process.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
15 6<sup>th</sup> day of October, 2019 in Chico, California.

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18 Richard Barton  
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